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January 9, 2020

**Via ECF**

Honorable Paul G. Gardephe  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: **Leopard Solutions LLC v. De Novo LLC, et al,**  
**Case No. 19-cv-08860**

Dear Hon. Judge Gardephe:

We represent Plaintiff Leopard Solutions LLC in the above-captioned action. We write pursuant to Your Honor's Individual Practices, Rule I(E) to request an adjournment of the preliminary pretrial conference in this matter. The conference is presently scheduled for January 16, 2020 at 10:45 a.m., and Plaintiff respectfully requests that the conference date be adjourned for a period of thirty (30) days, and suggests that the conference be rescheduled for February 20, 2020 or February 27, 2020. This letter represents the first request for any adjournment or extension in this matter.

Defendants De Novo LLC, Carly Steinbaum, Signal Blue Inc. and Matthew Herz (the "Named Defendants") have agreed to waive service of summons (Docket No. 15), and as such will not be required to serve its answer until February 18, 2020. Accordingly, the parties request that the preliminary pretrial conference be adjourned until after the Defendants respond to the Complaint.

Further, the parties are actively engaged in settlement negotiations, and are hopeful that the matter will be settled, and the case dismissed, in advance of the rescheduled preliminary pretrial conference. However, the parties need more time to finalize and execute settlement documents and attend to related settlement matters. Accordingly, Plaintiff respectfully requests that the Court approve this request for adjournment.

Counsel for the Named Defendants has consented to this request.

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We thank the Court for its attention to this request.

Respectfully submitted,

/s/ Meichelle. R. MacGregor

cc: Dylan Ruga, Esq. ([dylan@stalwartlaw.com](mailto:dylan@stalwartlaw.com))

Counsel for Defendants De Novo LLC, Carly Steinbaum, Signal Blue Inc. and Matthew Herz